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*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,  
and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA ) Cause No. CV 20-52-BLG-SPW  
MAPLEY, )

Plaintiffs, )

vs. )

WATCHTOWER BIBLE AND )  
TRACT SOCIETY OF NEW YORK, )  
INC., WATCH TOWER BIBLE AND )  
TRACT SOCIETY OF )  
PENNSYLVANIA, and BRUCE )  
MAPLEY SR., )

Defendants. )

**SECOND AFFIDAVIT OF  
PHILIP BRUMLEY, ESQ.**

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STATE OF NEW YORK )  
County of Putnam ) :ss

I, Philip Brumley, first being duly sworn, hereby depose and state:

1. I am General Counsel for defendant Watch Tower Bible and Tract Society of Pennsylvania. ("WTPA").

2. In this role, I have direct knowledge of the information contained in this Affidavit.

3. I have been made aware of the exhibits attached to the Plaintiffs' Response Brief in Opposition to Defendant Watch Tower Bible and Tract Society of Pennsylvania's Motion to Dismiss Pursuant to Rule 12(b)(2), Fed.R.Civ.P., specifically those labeled as Docs. 21-1, 21-2, 21-3, and 21-4.

4. Doc. 21-1 is a screenshot of a page on a website. As the website states, WTPA "is used by Jehovah's Witnesses to *support* their worldwide work, which includes publishing Bibles and Bible-based literature." (emphasis added). WTPA and Jehovah's Witnesses are not one and the same, and the "support" WTPA provides to Jehovah's Witnesses includes owning the copyright to the Bible and other Bible-based materials and funding international humanitarian relief efforts.

5. Regarding Doc. 21-2, pages 2-7 are a letter on the letterhead of Watchtower Bible and Tract Society of New York, Inc., to all Bodies of Elders in the United States that was not sent by or on behalf of WTPA. Page 8 is another screenshot of a page on a website that does not mention WTPA.

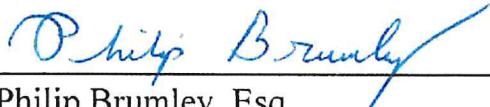
6. Doc. 21-3 is a personal letter from the now-deceased President of WTPA addressed to a person residing at Bethel, the world headquarters of Jehovah's Witnesses located in New York discussing an internal personnel matter.

7. Doc. 21-4 is a letter from the Office of Public Information responding

to an interview request from Betsan Powys with BBC Panorama about Jehovah's Witnesses generally, not WTPA. The Office of Public Information responded to the BBC on WTPA letterhead at the time, but has subsequently become a standalone office.

FURTHER THIS AFFIANT SAYETH NAUGHT.

DATED this 27<sup>th</sup> day of July, 2020.

By:   
Philip Brumley, Esq.

SUBSCRIBED and SWORN to before me by Philip Brumley, Esq., this  
27<sup>th</sup> day of July, 2020.

By:   
Notary Public for the State of New York

JONATHAN D. COLLYMORE  
Notary Public, State of New York  
Reg. No. 01CO6362241  
Qualified in Putnam County  
Commission Expires July 31, 2021